FINDING OF NO SIGNIFICANT IMPACT

Mather Campground Rehabilitation
Grand Canyon National Park

The National Park Service is proposing to rehabilitate Mather Campground, located in the Grand Canyon Village area of Grand Canyon National Park. The purpose of the proposal is to provide universal accessibility and a high quality visitor experience within Mather Campground. This would be achieved through the improvement of accessible campsites, upgrading restroom facilities, redesign of the entrance area, and relocation of campsites that are close to South Entrance Road and potential transit corridors. The proposed rehabilitation is needed because:

- The six existing accessible campsites are not adequate facilities for visitors with disabilities. They are clustered in one area of the campground, are too small and/or obstacles (rocks, gravel, uneven surfaces) are present in and around the sites. The campground is out of compliance with recently proposed guidelines by the U. S. Architectural and Transportation barriers Compliance Board (Access Board) for Outdoor Recreation Areas. Based on these guidelines, Mather Campground should have at least 12 universally accessible sites.
- South Entrance Road and potential transit corridors are close to several campsites in the southern section of the campground. The right-of-way of potential transit corridors along South Entrance Road is within 100 feet of 7 existing campsites along Juniper Loop. If a new transit system is implemented in the park, these campsites need to be relocated In order to maintain a quality camping experience in this area.
- Access to Mather Campground is via Market Plaza Road. Currently, as visitors turn onto the access road to the campground from Market Plaza road, they have about 275 feet before they must stop at the entrance kiosk to pay their campground fee. During busy times of the year, vehicles back up while waiting to pay. Vehicle lines often extend beyond the intersection with Market Plaza Road. This line of vehicles often blocks other vehicles from being able to enter the camper services building. These impacts to traffic flow in this small area create congestion and safety hazards. In addition, the current entrance kiosk is too small for current needs and does not meet current accessibility standards.
- The 11 comfort stations within the campground are inadequate. They do not meet current accessibility standards, the nearly flat roofs do not shed snow and water effectively, and walkways and paths are deteriorated and do not meet accessibility standards. The comfort stations were built during the early 1960's and are in need of repairs and upgrading.

In March 2002 the National Park Service (NPS) prepared an *Environmental Assessment (EA) for Mather Campground Rehabilitation*. This EA, in accordance with the National Environmental Policy Act, analyzes the impacts that would likely result from implementation of the project. The environmental assessment evaluated two alternative sites for relocating campsites, four alternative configurations for renovating the campground entrance, the rehabilitation of comfort stations and the conversion/rehabilitation of campsites to universally accessible campsites. These components were described in two primary alternatives, Alternatives A and B, then subdivided into a total of eight alternatives, Alternatives B1 – B4 and C1 – C4.

PREFERRED ALTERNATIVE

The preferred alternative will convert and/or rehabilitate 12-15 campsites to universally accessible campsites, rehabilitate comfort stations, relocate campsites from "Juniper Loop" to "Oak Loop", and renovate the campground entrance, resulting in approximately 1.5 acres of new ground disturbance. The following actions are included in the preferred alternative:

- **Accessibility Upgrades**: 12 – 15 camping sites will be converted/rehabilitated to universally accessible camping sites. The six sites currently identified as accessible will be redistributed throughout the campground. Campsites converted to accessible sites will be selected based on proximity to comfort stations, ability to widen the parking space, large tent pad space, and levelness of the site. Accessible sites will be evenly distributed throughout the campground and will be a mix of

pull-through and back-in sites. All sites will meet the proposed guidelines by the U.S. Architectural and Transportation Barriers Compliance Board (Access Board) for Outdoor Recreation areas. Accessible picnic tables, grills, and campsite signs will be added to each site. Work will include grading parking areas and campsites, replacing or widening parking space pavement, providing accessible pathways between campsites and comfort stations, and providing a 20 x 20 foot crushed granite tent pad at each site.

- **Restroom Rehabilitation**: 11 comfort stations within the campground will be rehabilitated. Rehabilitation will include making them universally accessible and addressing any maintenance needs. Modifications to each restroom may include actions such as demolition of some interior walls and partitions, addition of and/or replacement of existing windows and doors, and installation of new plumbing, piping and electrical fixtures. New floor slabs will be added for accessible toilet rooms and a small addition to each building to accommodate an accessible restroom may be necessary. The exterior of the rehabilitated buildings will be similar to the existing buildings but would likely have entry doors moved to the front of the building, opening onto covered porches. Roofs may be replaced. Site work will include minimum repair and upgrading of paths and walkways. The specific components necessary for the rehabilitation of each restroom and the resulting appearance of each building will be developed more fully among NPS staff during the upcoming design phases for this project to insure consistency with park service architectural guidelines, existing management policies, comments received from the Arizona State Historic Preservation Officer, and the applicability of the Secretary of the Interior's Standards for the Treatment of Historic Properties.

- **Entrance Renovation**: The existing entrance kiosk will be removed. The registration function the kiosk currently provides will be relocated to an existing modular building. This modular building will be retained in its current location but the shed will be relocated to accommodate a parking area for six RVs and 14 cars. Work will include clearing approximately 0.45 acres and paving a portion of this for parking area and walkways, grading, relocation of utilities and public phones, construction of drainage, and installation of signs, parking lighting, and a flagpole.

- **Campsite Relocation**: "Oak Loop" would be expanded by constructing 11 new campsites along the southeast portion of Mather Campground. Nine campsites will be demolished: two to accommodate the expanded loop and seven along "Juniper Loop" due to proximity to South Entrance Road and potential transit corridors. The construction of the new campsites will include grading, minor tree removal and clearing, construction of about 900 feet of a one-lane, 15-foot wide, asphalt road, paving for parking at each campsite, including six pull-through and seven back-in campsites, hardening of the ground at each campsite for a camping pad, picnic pad, and cooking pad, and the addition of picnic tables and fire grills. The demolition of the nine existing campsites will include removal of parking pads, picnic tables and fire grills, and revegetation of the area, which may include the addition of topsoil.

The mitigation measures listed below are considered part of the preferred alternative and will be followed during project implementation. These actions were developed to lessen the potential for adverse impacts from implementing the preferred alternative, and have proven to be very effective in reducing environmental impacts on previous projects.

- The staging area for the construction office (a trailer) and construction equipment and material storage would be located in previously disturbed areas near the campground. All staging areas would be returned to pre-construction conditions once construction is complete. Standards for this, and methods for determining when the standards are met, would be developed in consultation with the Park Restoration Biologist.
- If dust becomes a problem during work, sprinkling with water would occur to reduce dust, both on roadways used and/or in the construction site.
- Construction equipment would not idle for long periods to reduce noise and air quality impacts on site.
- Construction zones would be fenced with construction tape, snow fencing, or some similar material before any construction activity. The fencing would define the construction zone and confine activity

to the minimum area required for construction. All protection measures would be clearly stated in the construction specifications and workers would be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.

- To minimize soil erosion at the project site, standard erosion control measures including silt fence and sandbags would be incorporated into action alternatives. Any trenching operations would use a rock saw, backhoe, and/or trencher, with excavated material side-cast for storage. After trenching is complete, bedding material would be placed and compacted in the bottom of the trench and the utility lines installed in the bedding material. Back filling and compaction would begin immediately after the utility lines are placed into the trench and the trench surface would be returned to pre-construction contours. All trenching restoration operations would follow guidelines approved by park staff. Compacted soils would be scarified and original contours reestablished.
- A Revegetation Plan would be developed for the project by a landscape architect or other qualified individual, in coordination with the Park Restoration Biologist. Any revegetation efforts would use site-adapted native species and/or native seed, and Park policies regarding revegetation and site restoration would be incorporated into the plan. The plan would incorporate, among other things, the use of native species, plant salvage potential, exotic vegetation and noxious weeds, and pedestrian barriers. Revegetation policy (see Chapter 9) of NPS Management Policies (2001) would be referenced in the development of the Revegetation Plan for the project.
- To prevent and minimize the spread of exotic vegetation and noxious weeds, the Revegetation Plan would be followed. The following mitigation measures would be implemented, and would be incorporated into the plan:
  - Existing populations of exotic vegetation at the construction site would be treated before construction activities.
  - A restoration biologist or park natural resources representative would be on-site during the campground entrance reconfiguration layout to provide input on large tree avoidance and salvage potential.
  - All construction equipment that would leave the road would be pressure washed before entering the park.
  - The location of the staging area would be limited to existing roads or the disturbed area.
  - Parking of vehicles would be limited to the staging area and existing roads.
  - Any fill materials would be obtained from a park-approved source and approved by the Park Restoration Biologist.
  - All areas disturbed by construction would be revegetated using site-adapted native seed and plants.
  - Post-project exotic plant monitoring should also be conducted in the project area, as time and funding allows.
- Construction workers and supervisors would be provided with tree pruning guidelines. The adherence to these guidelines would minimize damage to trees during project implementation.
- Construction workers and supervisors would be informed about special status species. Contract provisions would require the cessation of construction activities if a species were discovered in the project area, until park staff re-evaluates the project. This would allow modification of the contract for any protection measures determined necessary to protect the discovery.
- Prior to the start of construction, the park would contact personnel responsible for radiotracking and monitoring of condors to determine the latest locations for condors in the project area.
- If a California condor occurs at the construction site, construction would cease until it leaves on its own or until techniques are employed by permitted Park staff or Peregrine Fund personnel that result in the condor leaving the area.
- Construction workers and supervisors would be informed to not interact with condors and to immediately contact the appropriate Park or Peregrine fund personnel when condor(s) occur at the construction site.
- The construction site would be cleaned up at the end of each day the work is being conducted (i.e. trash disposed of, scrap materials picked up) to minimize the likelihood of condors visiting the site. Site clean up would also minimize the likelihood of other animals investigating the area for water and scavenging and would reduce safety concerns related to people coming to the site after hours.

- To prevent water contamination and potential poisoning of California condors or other wildlife, a vehicle fuel leakage and spill plan would be developed and implemented. The plan would include immediate clean up of any hazardous substance. The plan would define how each hazardous substance would be treated in case of leakage or spill.
- The project area and immediate vicinity would be surveyed for northern goshawks before construction, if construction were scheduled to occur during late March – August 1. Surveys would be conducted according to accepted protocol, under the supervision of park biologists, during April – July 2002. If a goshawk nest is found, or goshawks are otherwise determined to be in the area, consultation between the project manager and the park biologist would be conducted before project implementation.
- If previously unknown archeological resources are discovered during construction, all work in the immediate vicinity of the discovery would be halted until the resources could be identified and documented and an appropriate mitigation strategy developed, if necessary, in accordance with the stipulations of the 1995 Programmatic Agreement Among the National Park Service, the Arizona State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding the General Management Plan/Environmental Impact Statement, Grand Canyon National Park, Arizona.
- All workers would be informed of the penalties for illegally collecting artifacts or intentionally damaging any archeological or historic property. Workers would also be informed of the correct procedures if previously unknown resources were uncovered during construction activities. Data recovery excavations would be carried out to mitigate adverse affects as outlined in the section on environmental consequences.
- The NPS has conducted archeological surveys to identify resources in the project area and no archeological sites were discovered. However, should unknown buried deposits be located, work would be halted and the Park Archeologist would be consulted immediately. Future actions, depending on the type of discovery, may include data recovery excavations guided by a project-specific research design. Additionally, the NPS would begin consultations under the Native American Graves Protection and Repatriation Act in the event that buried human remains is discovered during archeological excavations or project development.
- Archeological sites within the vicinity of Oak Loop (sites B:16:212 and B:16:482 would continue to be monitored as part of the park's routine monitoring program. If indirect impacts (like increased surface collecting) are apparent following project implementation, the park would determine the need for any additional protective measures and would consult with the State Historic Preservation Officer and concerned tribal officials, as necessary.
- The specific components necessary for the rehabilitation of the comfort stations and the resulting appearance of each building would be developed more fully among NPS staff during the design phases for this project. This group would evaluate and consider the comments received from the Arizona State Historic Preservation Office and determine the applicability of the Secretary of the Interior's Standards for the Treatment of Historic Properties, park architectural guidelines, and existing management policies, while also addressing the purpose and need for action.
- To minimize the potential for impacts to campground visitors, variations on construction timing would be considered. Options include conducting the majority of the work in the off-season (winter) or shoulder seasons, limiting the amount of work conducted at any one time during the peak season (i.e. one camping space renovation at a time, etc.) and implementing daily construction activity curfews. Unless additional time is authorized by park management, operation of heavy construction equipment would not occur between the hours of 6 PM to 8 AM in summer (May - September), and 5 PM to 9 AM in the winter (October - April), to minimize the impacts of noise from construction activities to campground visitors and the Canyon's natural quiet.
- Traffic in any one direction would not be stopped for more than 15 minutes to minimize disruption of traffic flow during construction.

ALTERNATIVES CONSIDERED

The environmental assessment evaluated two alternative sites for relocating campsites, four alternative configurations for renovating the campground entrance, the rehabilitation of comfort stations and the conversion/rehabilitation of campsites to universally accessible campsites. These components were described in two primary alternatives, Alternatives A and B, then subdivided into a total of eight

alternatives, Alternatives B1 – B4 and C1 – C4. The preferred alternative, as described above, was identified in the Environmental Assessment as Alternative C4. A no action alternative, Alternative A, was also evaluated. Although there were differences in the degree to which each action alternative would achieve the project objectives, each action alternative complies with the most recent accessibility guidelines for outdoor recreation areas, minimizes noise disturbance and visual impact to campsites from South Entrance Road and potential transit corridors, facilitates visitor check-in, minimizes conflict with camper services, brings comfort stations and associates paths and walks up to current accessibility standards, provides restroom facilities that effectively shed water and snow, while recognizing the existing architectural merit of the buildings, and minimizes new ground disturbance. A summary of each alternative is described below:

- Alternative A, the No-Action alternative, would not change the existing situation at Mather Campground and the campground would maintain in its current condition. The campground would continue to be out of compliance with the most current accessibility standards. The campsites along Juniper Loop would continue to be close to South Entrance Road and potential transit corridors. Restrooms throughout the campground would continue to be below current standards for accessibility and would still need repair. The campground entrance would remain in its current configuration, causing vehicle pile up during peak season that results in safety hazards and conflicts with visitor access to camper services. Alternative A serves as the baseline for comparison of the action alternatives.
- Alternative B would rehabilitate 11 comfort stations, upgrade 12-15 campsites to universally accessible campsites, and would construct 11 new campsites along “Juniper Loop” and close nine campsites (two to accommodate the new loop and seven due to their proximity to South Entrance Road and potential transit corridors). Alternative B1 would implement entrance area option 1 (remove existing kiosk, relocate registration function to existing modular building and move this building and nearby shed a short distance to accommodate a parking area for six recreational vehicles (RV) and 11 cars). Alternative B2 would implement entrance area option 2 (remove existing kiosk, relocate registration function to existing modular building and move this building and nearby shed a short distance to accommodate a parking area for six RVs and seven cars). Alternative B3 would implement entrance area option 3 (remove existing kiosk, relocate registration function to existing modular building, retain the building in its current location but relocate the shed to accommodate a parking area for five RVs and 17 cars). Alternative B4 would implement entrance area option 4 (remove existing kiosk, relocate registration function to existing modular building, retain the building in its current location but relocate the shed to accommodate a parking area for six RVs and 14 cars).
- Alternative C would rehabilitate 11 comfort stations, upgrade 12-15 campsites to universally accessible campsites, and would construct 11 new campsites along “Oak Loop” and close nine campsites (two on “Oak Loop” to accommodate the new campsite loop and seven along “Juniper Loop” due to their proximity to South Entrance Road and potential transit corridors). Alternative C1 would implement entrance area option 1. Alternative C2 would implement entrance area option 2. Alternative C3 would implement entrance area option 3. Alternative C4 would implement entrance area option 4.

The preferred alternative (Alternative C4) was selected over these other alternatives because it would adaptively reuse an existing structure in its current location, would result in a parking area size that best addresses the current and future needs of Mather Campground visitors, would minimize the noise and visual impact of South Entrance Road and potential transit corridors, and would minimize the amount of new ground disturbance. While all alternatives meet the purpose and need for action and would not result in substantial impacts to natural or cultural resources, the preferred alternative would result in slightly less ground disturbance than the other alternatives, would minimize the level of ponderosa pine tree removal necessary for the new campsites, and would minimize the number of large ponderosa pine trees that would need to be removed to accommodate the new parking area/entrance.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which guides the Council on Environmental Quality (CEQ).

The CEQ provides direction that "[t]he environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101:

- fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The preferred alternative is the environmentally preferred alternative. Potential resource impacts, visitor impacts, and mitigation measures were carefully reviewed. The preferred alternative best strikes a balance between the necessity of providing universal accessibility and a high quality visitor experience in Mather Campground with preservation of the park's natural and cultural resources.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse. As fully discussed in the Environmental Assessment, the preferred alternative will not affect geology; prime and unique agricultural land; air quality; soundscape; floodplains; wetlands; state listed special status wildlife and plant species; (except the Northern goshawk, see below); general terrestrial, aquatic and wildlife habitat; federally listed wildlife and plant species (except the California condor and Mexican spotted owl, see below); local or regional socioeconomics; minorities or low-income populations or communities; or ethnographic resources.

Implementation of the preferred alternative may have a direct and indirect short-term minor adverse impact to soil and water resources due to increased surface runoff and sedimentation; short-term and long-term minor adverse impact to biotic communities due to a minor loss of vegetation and increased risk of spread and introduction of exotic plant populations following construction; minor short-term adverse impact to Northern goshawks, but would not result in a trend toward federal listing or a loss of viability; negligible long-term adverse impact to archeological resources; and long-term minor beneficial impact to visitor experience by improvements in accessibility, restroom facilities, and traffic flow.

After applying the Advisory Council on Historic Preservation's criteria for adverse effects (36 CFR, Part 800.5, Assessment of Adverse Effects), implementation of the preferred alternative would not affect historic resources and a "no historic properties affected" determination has been made.

Implementation of the preferred alternative may affect, but is not likely to adversely affect the federally listed California condor and Mexican spotted owl. This determination received concurrence from the U. S. Fish and Wildlife Service on April 17, 2002.

Degree of effect on public health or safety. The Environmental Assessment evaluated impacts to traffic flow and determined that the elimination of the vehicle backup problem by creation of a new parking area at the entrance would minimize traffic congestion and result in a long-term minor beneficial impact on traffic flow. This would result in a reduction in the safety hazard that currently exists for users of Market Plaza Road near the campground entrance during the busiest times of the season. In addition to the public safety issue regarding vehicle backup onto Market Plaza Road, safety of visitors using the new parking area was also discussed. Implementation of the preferred alternative would require drivers using 11 of the total parking spaces to cross traffic flow within the parking lot to reach the registration facility.

This creates a potential for pedestrian and vehicle conflict. This potential safety hazard would be minimized by implementation of standard safety practices such as crosswalk delineation, signage, etc. The Environmental Assessment documented the conclusion that this increased risk to public safety would be negligible due to implementation of standard safety practices. Implementation of the preferred alternative would result in a beneficial impact on traffic flow, and therefore, would result in a positive effect to public health and safety.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. As fully discussed in the Environmental Assessment, geological resources, archeological resources, historic resources, ethnographic resources, prime farmlands, and wetlands will not be affected by implementation of the preferred alternative. No wild and scenic rivers are near Grand Canyon Village and none will be affected by implementation of the preferred alternative. No ecologically critical areas, including critical habitat for threatened, endangered, or proposed species, have been designated in the project area and none will be affected. Implementation of the preferred alternative would result in a "no historic properties affected" determination. Implementation of the preferred alternative would result in a "may affect, not likely to adversely affect" determination for California condor and Mexican spotted owl. Consultation with concerned tribal officials, Arizona State Historic Preservation Officer, and U. S. Fish and Wildlife Service has been completed.

Degree to which effects on the quality of the human environment are likely to be highly controversial. There were no highly controversial effects identified during either preparation of the environmental assessment or the public review period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks. There were no highly uncertain, unique or unknown risks identified in the environmental assessment or during the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. The preferred alternative neither establishes a precedent for future actions with significant effect nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Impacts of the preferred alternative identified in the environmental assessment were to soils, vegetation, wildlife and special status species, archeological and historic resources, visitor experience and park operations. As described in the environmental assessment, a variety of past, present, and reasonably foreseeable future actions have affected or may affect resources in the Grand Canyon Village area. However, the adverse impacts of the preferred alternative would be a relatively minor component of the overall minor cumulative impact, due to the limited scope of the preferred alternative.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources. The project area was surveyed for archeological resources. Two archeological sites have been located outside the project area, but in the vicinity of the campground and near South Entrance Road. Due to the distance from the project area, however, it is unlikely that direct or indirect adverse impacts to these sites would occur. Mitigation measures have been developed to minimize the likelihood of indirect adverse impacts following project implementation. Consultation with the concerned tribal officials has been completed. The preferred alternative would rehabilitate the comfort stations within Mather Campground. These are "Mission 66" structures, but have been determined by park staff and the Arizona State Historic Preservation Office (SHPO) not to be eligible for listing on the National Register of Historic Properties. Mather Campground does not occur within or adjacent to any National Register-listed historic districts or historic buildings. It has been determined that implementation of the preferred alternative would result in a "no historic properties" determination and SHPO has concurred with this determination. However, SHPO has recommended that

rehabilitation of the comfort stations be done in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, since the comfort stations are potentially eligible for listing on the National Register when they reach 50 years old. These recommendations are addressed in the attached errata sheet.

If previously unknown archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources are identified and documented. An appropriate mitigation strategy, if necessary, would be developed in consultation with the Arizona State Historic Preservation Office and concerned tribal officials.

Archeological sites in the vicinity of Oak Loop would continue to be monitored as part of the park's routine monitoring program. If indirect impacts (like increased surface collecting) are apparent following project implementation, the park would determine the need for any additional protective measures and would consult with the Arizona State Historic Preservation Office and concerned tribal officials, as necessary.

The specific components necessary for the rehabilitation of the comfort stations and the resulting appearance of each building would be developed more fully among NPS staff during the design phases for this project. This group would evaluate and consider the comments received from the Arizona State Historic Preservation Office and determine the applicability of the Secretary of the Interior's Standards for the Treatment of Historic Properties, park architectural guidelines, and existing management policies, while also addressing the purpose and need for action.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat. The California condor was listed as an endangered species in 1967. A nonessential, experimental population of California condors has been established in Northern Arizona, and within Grand Canyon National Park the condor has the full protection of a threatened species. It has been determined by park staff that implementation of the preferred alternative "may affect, but is not likely to adversely affect" the California condor. This determination is based on the potential that condors could be attracted to the increased activity at the project site during construction. Mitigation measures have been developed jointly between park staff and the U.S. Fish and Wildlife Service (FWS) to minimize the potential for adverse impacts to the condor during project implementation. These measures are included as part of the proposed action and identified under the preferred alternative. The FWS has been consulted and concurred with the determination that condors may be affected, but are not likely to be adversely affected by the implementation of the preferred alternative. The Mexican spotted owl was listed as a threatened species in 1993 and parts of Grand Canyon National Park were designated as critical habitat in 2001. It has been determined by park staff that implementation of the preferred alternative "may affect, but is not likely to adversely affect" the Mexican spotted owl. This determination is based on the fact that owl habitat is not present within the project area, owls have not been detected in the project area, and the nearest provisional Protected Activity Center is greater than 0.5 miles away The FWS has been consulted and concurred with the determination that spotted owls may be affected, but are not likely to be adversely affected by the implementation of the preferred alternative.

Whether the action threatens a violation of Federal, state, or local environmental protection law. The preferred alternative violates no federal, state, or local environmental protection laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

In addition to determining the environmental consequences of the preferred and other alternatives, National Park Service policy (*Management Policies*, 2001) requires analysis of potential effects to determine whether or not actions would impair park resources. The fundamental purpose of the National Park System, established by the Organic Act and reaffirmed by the General Authorities Act as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values. However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of the park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain

impacts within parks, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Impairment may result from National Park Service activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. An impact to any park resource or value may constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- Key to the natural or cultural integrity of the park; or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents.

Because there would be no major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Grand Canyon National Park; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents, there would be no impairment of Grand Canyon National Park's resources or values as a result of implementation of the preferred alternative.

PUBLIC INVOLVEMENT

A public scoping letter for the Mather Campground Rehabilitation project was sent to a mailing list of approximately 300 people on October 24, 2001. A press release was also issued and the scoping letter was posted on the park's website. Comments in response to the scoping letter were received from the Navajo Nation, Zuni Heritage and Preservation Office, and the Hopi Tribe. The environmental assessment was made available for public review and comment during a 30-day period ending April 12, 2002 through a combination of direct mailing, issuance of a press release and posting on the park's website. The Arizona State Historic Preservation Office responded to the EA, stating concurrence with the determinations documented in the environmental assessment for historic properties, but requesting that revisions be made to the EA to more adequately reflect the subject of their previous comments on the eligibility and treatment of the comfort stations. These comments are addressed in the errata sheet attached to this Finding of No Significant Impact (FONSI), resulted in minor wording revisions to the EA, and the addition of a mitigation measure, as listed on pages 2-5 of this FONSI.

The U.S. Fish and Wildlife Service was sent a copy of the EA, a Biological Assessment, and the park's request for concurrence with the determination of effects to federally listed species. The March 2002 environmental assessment documented a determination of "may affect, not likely to adversely affect" for the California condor and a "no effect" determination for the Mexican spotted owl. During the preparation of the Biological Assessment, the determination for the Mexican spotted owl was changed to "may affect, not likely to adversely affect." The U.S. Fish and Wildlife Service concurred with these determinations, resulting in the need to revise the determination of effect to Mexican spotted owl in the EA and to slightly revise the mitigation measures listed for minimizing the potential for adverse impacts to the California condor during construction. These comments are addressed in the errata sheet attached to this Finding of No Significant Impact (FONSI) and are documented in the list of mitigation measures on page 2-3 of this FONSI.

No other comments on the Mather Campground Rehabilitation Environmental Assessment were received.

CONCLUSION

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). Negative environmental impacts that could occur are minor and temporary in effect. There are no unmitigated adverse impacts on public health, public safety, threatened

or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, known ethnographic resources, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that the project does not constitute a major federal action significantly affecting the quality of the human environment and an EIS will not be required for this project and thus will not be prepared.

Recommended: _____ 5/6/02
Jeffrey Cross — Date
Science Center Director, Grand Canyon National Park

Recommended: _____ 5/8/02
for Joseph F. Alston — Date
Superintendent, Grand Canyon National Park

Approved: _____ 5/18/02
Karen P. Wade — Date
Intermountain Regional Director

ERRATA SHEET

Mather Campground Rehabilitation
Grand Canyon National Park

The NPS received two letters in response to our request for comments on the Mather Campground Rehabilitation Environmental Assessment (March 2002). The comment period ended April 12, 2002. An interdisciplinary team reviewed the letters and identified substantive comments. Substantive comments were considered to be comments which:

- question, with reasonable basis, the accuracy of information in the EA.
- question, with reasonable basis, the adequacy of environmental analysis.
- present reasonable alternatives other than those presented in the EA.
- cause changes or revisions in the proposal.

Below are the substantive comments received and the NPS response.

***Comment**:* Prior to the start of construction, the park will contact personnel responsible for radiotracking and monitoring condors to determine the latest locations for condors in the project area.

> ***Response**:* A mitigation measure has been developed to address this issue and is included in the mitigation measures listed on pages 2-5 of the FONSI, and added to page 16 of the EA. This mitigation measure is as follows:
>
> *"Prior to the start of construction, the Park would contact personnel responsible for radiotracking and monitoring condors to determine the latest locations for condors in the project area."*

***Comment**:* If a condor occurs at the construction site, construction would cease until it leaves on its own or until techniques are employed by permitted park staff or Peregrine Fund personnel which results in the individual condor leaving the area.

> ***Response**:* The mitigation measure in the EA that addresses condor visits to the construction site has been slightly re-worded to fully address this concern (page 16 of the EA). This revised mitigation measure is included in the mitigation measures listed on pages 2-5 of the FONSI. This mitigation measure is as follows:
>
> *"If a California condor occurs at the construction site, construction would cease until it leaves on its own or until techniques are employed by permitted Park staff or Peregrine Fund personnel that result in the condor leaving the area."*

***Comment**:* It has been determined that implementation of the preferred alternative may affect, but is not likely to adversely affect the Mexican spotted owl or its habitat.

> ***Response**:* The determination of effects for the Mexican spotted owl in the EA has been revised to reflect this change from a "no effect" determination to a "may affect, but not likely to adversely affect" determination. This resulted in slight wording changes on page 20 and page 35 of the EA. This determination is also reflected in the FONSI and has received concurrence from the Fish and Wildlife Service.

***Comment**:* The Mission 66 comfort stations in Mather Campground are potentially eligible for listing, once they reach 50 years old. The Secretary of the Interior's Standards for the Treatment of Historic Properties should be used during the rehabilitation effort so that this future eligibility is not adversely affected.

***Response**:* To more adequately reflect this opinion from the State Historic Preservation Office, slight wording changes have been made on page 9 and 38 of the EA. Wording was added to the description of the restroom rehabilitation description on page 9 of the EA as follows:

> *"The specific components necessary for the rehabilitation of the comfort stations and the resulting appearance of each building would be developed more fully among NPS staff during the design phases for this project. This group would evaluate and consider the comments received from the Arizona State Historic Preservation Office and determine the applicability of the Secretary of the Interior's Standards for the Treatment of Historic Properties, park architectural guidelines, and existing management policies, while also addressing the purpose and need for action."*

Wording was added to the Historic Resources affected environment section on page 38 of the EA as follows:

> *"However, SHPO is of the opinion that these structures are potentially eligible for listing on the National Register once they reach 50 years old and recommend that the Secretary of the Interior's Standards for the Treatment of Historic Properties (Weeks 1995) be used to guide rehabilitation efforts at this time."*

A mitigation measure has been developed to address the need for park staff to convene during the design phases of the rehabilitation effort to determine the best course of action for specific components of the comfort station rehabilitation. This measure has been added to page 17 of the EA and is included in the mitigation measures listed on pages 2-5 of the FONSI. This mitigation measure is as follows:

> *"The specific components necessary for the rehabilitation of the comfort stations and the resulting appearance of each building would be developed more fully among NPS staff during the design phases for this project. This group would evaluate and consider the comments received from the Arizona State Historic Preservation Office and determine the applicability of the Secretary of the Interior's Standards for the Treatment of Historic Properties, park architectural guidelines, and existing management policies, while also addressing the purpose and need for action."*

A citation for the Secretary's Standards has been added to the Literature Cited section of the EA on page 54.